

Empfehlung T/R 61-01.

(C) Additionally, the FCC could demonstrate its genuine willingness to participate in arrangements of this type by signing agreements with individual countries wishing to negotiate them now. An example would be for the FCC to accept a proposal that was sent to it by the Federal Republic of Germany (FRG) two years ago suggesting that a bilateral agreement be worked out between the two countries whereby Amateur Radio operations would be allowed during temporary stays or visits in each others county based solely on acceptance of the provisions of CEPT Recommendation T/R 61-01 by both countries and without requiring the issuance of a temporary permit. Initial agreements such as this should be formed not only between the FCC and the FRG, but also with other receptive individual European Telecommunications Administrations in order to prove that the United States' is truly interest in wanting to have flexible temporary licensing procedures. U.S. licenses and CEPT licenses could be correlated to each other as indicated in the following table:

			National License		Foreign Licensee	
			Callsign		Privileges N.T.E.	
No.	Country	Prefix	Class 1	Class 2	Class 1	Class 2
1a	USA	W/	E, A, G		Extra	
1b	USA	N/	T,N		Tech Plus	

*Summary of benefits:*

(A) If the FCC adopts the proposed amendments to Parts 97.5 and 97.107:

(1) The FEDERAL COMMUNICATIONS COMMISSION, the U.S. Government, and the American taxpayer would realize immediate savings in:

(a) the manpower intensive process of manually issuing Alien Operator Permits to "CEPT amateur radio license" holders who are citizens of CEPT member countries,

(b) the costs of unnecessary printing of the Alien Operator Permits which would no longer need to be issued to "CEPT amateur radio license" holders who are citizens of CEPT member countries, and

(c) the costs of unnecessary printing of the FCC Form 610-A which will no longer need to be stocked in all European Embassies or by European Amateur radio organizations and which will no longer need to be filled out by "CEPT amateur radio license" holders who are citizens of CEPT member countries that want to operate in the Amateur Radio Service while visiting the U.S.

(2) Amateur Radio Operators who are citizens of CEPT member countries and who are in possession of an Amateur Radio License issued by a CEPT member country would benefit by:

(a) elimination of the wait required to apply for, the

time required for the FCC to issue, and the costs and hassles associated with obtaining an Alien Operator Permit, and

(b) having the ability to operate Amateur Radio in the U.S. on short notice trips immediately upon arrival.

(B) Additionally, if an extension of CEPT Recommendation T/R 61-01 to include non-CEPT countries would be suggested by the FCC, the CEPT convinced to consider adopting such a proposed extension, and the U.S. allowed to participate fully in the extended Recommendation:

(1) The FEDERAL COMMUNICATIONS COMMISSION, the U.S. Government, and the American taxpayer would realize further benefits from:

(a) a drastic reduction in the administrative workload of the FCC since the number of Telecommunications Administrations that must be negotiated with concerning all Amateur affairs in Europe would decrease from thirty-one individual CEPT member countries to one single CEPT administration, freeing personnel to perform other perhaps more pressing matters and allowing the FCC to reallocate its resources in order to increase its efficiency, and

(b) standardization of privileges, operating conditions, and agreements between the United States and CEPT member countries.

(2) U.S. Amateur Radio operators wishing to operate Amateur Radio in any CEPT member country at any time during temporary stays or visits would profit by:

(a) elimination of the wait required when applying for, the time required for each Telecommunications Administration to issue, and the costs and hassles associated with obtaining a short term Amateur Radio visitors' license in each individual CEPT member country,

(b) operation of Amateur Radio in the respective countries on short notice trips immediately upon arrival, and

(c) the true ability to demonstrate the amateur's unique ability to enhance international goodwill abroad.

(C) If the FCC would simply accept the Federal Republic of Germany's proposal in addition to approaching Telecommunications Administrations in other receptive European countries and attempting to negotiate bi-lateral agreements to mutually recognize the conditions of CEPT Recommendation T/R 61-01 between the FCC and these other administrations:

(1) The FEDERAL COMMUNICATIONS COMMISSION, the U.S. Government, and the American taxpayer would immediately benefit from:

(a) a show of good faith by demonstrating the FCC's desire to attain true reciprocity with CEPT member countries and willingness to assist them with decreasing their administrative burdens as well as the FCC's, and

(b) already having bi-lateral agreements in place that simulate the CEPT Recommendation T/R 61-01, which would allow

operations to begin in these countries now, and which would remain effective until CEPT can take action on any consideration for extension of the Recommendation.

(2) U.S. Amateur Radio operator wishing to operate Amateur Radio in the Federal Republic of Germany and other receptive European countries would profit by:

(a) elimination of the wait required when applying for, the time required for each Telecommunications Administration to issue, and the costs and hassles associated with obtaining a short term Amateur Radio visitors' license in the FRG and other receptive CEPT member countries, and

(b) operation of Amateur Radio in the respective countries on short notice trips immediately upon arrival.

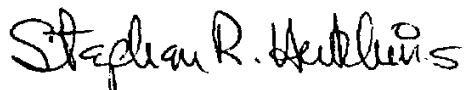
(D) As envisioned in ITU Resolution 640, the entire world will eventually benefit from Amateur Radio Operators having the possibility of immediately operating their Amateur Radio station across boundaries during emergencies and disasters freely and without the necessity of having to obtain an operators license in advance.

*Summary and Conclusion:*

The Wiesbaden Amateur Radio Club feels that the time is right to forge broader Amateur Radio operating agreements with our European friends and allies as 1992 and the reality of the European

RM -

Economic Community approaches. The FCC has already set the precedence for recognizing the Amateur Radio Licenses issued by CEPT member countries in Part 97 by recognizing the licenses of Canadian citizens. It is up to the United States of America through the FCC to take the initiative in the process by recognizing Amateur Radio licenses issued by CEPT member countries, approaching the CEPT indicating a desire to participate in the Recommendation T/R 61-01 if it were to be extended to include non-CEPT countries, and at least in the interim, negotiating preliminary CEPT-like operating agreements with a few Telecommunications Administrations of CEPT member countries like the FRG. Acceptance of an extension of CEPT Recommendation T/R 61-01 by the CEPT to include non-CEPT member countries will only occur if non-CEPT countries such as the U.S. show genuine interest in participating in the Recommendation and thereby convince the CEPT to adopt an extension under those conditions which it deems appropriate. This is clearly a situation where everyone can be a winner just by working more closely together.



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## Recommendation T/R 61-01 (Nice 1985)

## CEPT RADIO AMATEUR LICENCE

Recommendation proposed by the "Radiocommunications" Working Group T/WG 3 (R)

*Text of the Recommendation adopted by the "Telecommunications" Commission:*

"The European Conference of Postal and Telecommunications Administrations,

*whereas*

- (a) the amateur service is a radiocommunications service governed by the Radio Regulations and by the national regulations of the countries of the CEPT,
- (b) Administrations are responsible, in accordance with article 32, paragraph 3, of the Radio Regulations, for taking such measures as they judge necessary to verify the operational and technical qualifications of radio amateurs, and for ensuring that they undergo a Morse telegraphy test, permitting them to operate on frequencies below 30 MHz,
- (c) the issue and administration of temporary authorisations based on existing bilateral agreements involves a considerable increase in work for CEPT member Administrations,
- (d) technical developments and the growing standardisation of amateur radio equipment in the CEPT member countries mean a reduction in the risks of harmful interference,
- (e) certain CEPT member Administrations have concluded or are drawing up agreements intended to simplify the current procedure for the issue of temporary licences,

*noting, however*

- (f) that this Recommendation bears no relation to the import and export of amateur radio equipment, which is subject only to the relevant customs regulations,

*recommends*

that the CEPT member Administrations recognise the principle of a "CEPT radio amateur licence", under the conditions specified in Appendix I, on which the member Administrations will levy neither duties or taxes, only the Administration issuing the licence being entitled to do so."

## Appendix I

### GENERAL CONDITIONS FOR ALLOCATION OF CEPT AMATEUR RADIO LICENCE

#### 1. GENERAL PROVISIONS RELATING TO THE "CEPT AMATEUR RADIO LICENCE"

The "CEPT amateur radio licence" will take a form similar to a national licence or a special document issued by the same authority, and will be drafted in the national language, and in German, English and French; it will be valid for non-residents only, for the duration of their temporary stays in CEPT member countries having adopted the Recommendation, and within the limit of validity of the national licence. Radio amateurs holding a temporary licence may not benefit from the provisions of the Recommendation.

The minimum requirements for a CEPT licence will be:

- i) a declaration according to which the holder is authorised to utilise his amateur radio station in accordance with this Recommendation in countries where the latter applies;
- ii) the name and address of the holder;
- iii) the call sign;
- iv) the CEPT licence class;
- v) the validity;
- vi) the issuing authority.

It is recommended that a list be added to the Administrations applying the Recommendation.

#### 2. LICENCE CLASSES

Each of the CEPT classes described below will only be considered as equivalent to a national class in cases where conditions of utilisation in another country are not considerably broader than those in the country where the licence was issued. Equivalents are given in columns 3 and 4 of the Table of Appendix II.

##### *Class 1*

This class permits utilisation of all frequencies allocated to the amateur service and authorised in the country where the station is to be operated. It will be open only to those amateurs who have proved their competence with Morse code to their own Administration.

##### *Class 2*

This class limits utilisation of stations to frequency allocations above 144 MHz, authorised for the amateur service in the country where the station is to be installed.

#### 3. CONDITIONS OF UTILISATION

- 3.1. The holder shall present his CEPT radio amateur licence on request to the supervisory authorities in the country visited.
- 3.2. Authorisation is granted for utilisation of a portable or mobile station only. A portable station shall, for the purposes of this Recommendation, include any station using mains electricity at a temporary location, e.g. a hotel.
- 3.3. Authorisation is also granted for utilisation of the station of a radio amateur holding a licence in the host country.
- 3.4. The holder shall observe the provisions of the Radio Regulations, this Recommendation and the regulations in force in the country visited; he shall, furthermore, respect any restriction placed on him concerning local conditions of a technical nature or regarding the public authorities.
- 3.5. The use of the station aboard an aircraft is prohibited.



- 3.6. When transmitting in the visited country the licence-holder must use his national call sign preceded by the country designation, as specified by the visited country, and followed by the letter M for a mobile station and P for a portable station.
- 3.7. The licence-holder may not request protection against harmful interference.

4. **TECHNICAL CONDITIONS**

The technical conditions which apply will be those of the national class corresponding to the CEPT class in question. These correspondences are found in the two right-hand columns of the Table in Appendix II.

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## Appendix II

TABLE OF CORRESPONDENCES BETWEEN CEPT LICENCE CLASSES  
AND DIFFERENT NATIONAL CLASSES

No.	Country	Call sign	CEPT classes corresponding to national classes in respective countries		Holders of CEPT classes authorised to transmit in accordance with national classes in force in respective countries	
			3		4	
1	2		Class 1	Class 2	Class 1	Class 2
1	Germany (Fed. Rep. of)	DA-DP	B	A, C	B	C
2	Austria	OE	A, B, C*	A, B, C**	A, B, C*	A, B, C**
3	Belgium	ON	C	A, B	A, B, C	A, B
4	Cyprus	5B				
5	Denmark	OX-OZ	A, B	C, D, E	B	D
6	Spain	EA-EB-EC	A	B	A	B
7	Finland	OH				
8	France	F	D, E	A, B, C	C, D	A, B
9	Greece	SV	A, B, C	—	A, B, C	—
10	Ireland	EI	A	B	A	B
11	Iceland	TF	A, B, C	T	A, B	T
12	Italy	I	General	Limited	General	Limited
13	Liechtenstein	HB0	1, 2	3, 4	1, 2	3, 4
14	Luxembourg	LX				
15	Malta	9H				
16	Monaco	3A	General	Limited	General	Limited
17	Norway	LA-LB	A, B		A, B	
18	Netherlands	PA	A, B	C	A	C
19	Portugal	CT-CU	A, B, C*	A, B, C, D**	A	D
20	United Kingdom	G	A	B	A	B
21	San Marino	T7				
22	Sweden	SJ-SM	A	B, C, T	T	T
23	Switzerland	HB	1, 2	3, 4	1, 2	3, 4
24	Turkey	TA				
25	Vatican (City)	HV				
26	Yugoslavia	YU	A, B	D, E**	B	D, E

\* With practical tests in Morse code telegraphy, manual transmission and reception.

\*\* Without practical test in Morse code telegraphy.

\*\*\* There is another class "C" for the beginner which include some or the frequency sub-band attributed to the amateur service, for some emitter class and with limitation power like class A.

**Proposal for the extension of CEPT Recommendation T/R 61-01 to include  
voluntary participation by administrations which are not members of CEPT**

In the early 1980s several European countries introduced bilateral agreements regarding the recognition of their amateur licences as well as granting general operational rights to each other's radio amateurs. These agreements worked well, and led to the adoption, in 1985, of CEPT Recommendation T/R 61-01. This recommendation has now worked successfully for five years, and by 1990 16 out of the 26 CEPT states have joined the agreement, representing about 90 % of the licensed radio amateurs in the CEPT region. In recent years there have been increasing calls for non-CEPT countries to be allowed to participate.

The agreement has not only meant a reduction in the administrative burden placed on the PTT administrations, but has also made things much simpler for the Amateur Radio Service in the participating countries. Wider participation would be welcomed by the licensing authorities of non-CEPT countries as well as the amateur radio societies of these countries and the International Amateur Radio Union (IARU). If non-CEPT countries were able to join the CEPT Recommendation T/R 61-01 there would no longer be any need for individual agreements on reciprocal licensing.

It is therefore considered desirable that interested non-member administrations should approach CEPT with a view to finding a way in which they may participate in procedures according to Recommendation T/R 61-01.

One proposal as to how this may be done has been attached to this document. One advantage of this proposed method is that it would not require any major changes to the present wording of the Recommendation. It is therefore suggested that two Appendices be added to Recommendation T/R 61-01. Appendix IV will be analogous to the existing Appendix II "Table of Correspondences between CEPT Licence Classes and Different National Classes".

D r a f t

Suggested extension of CEPT Recommendation T/R 61-01

A second paragraph is to be added to the text of "recommends" to enable participation by non-CEPT administrations.

(existing) recommends

1. that the CEPT member Administrations recognize the principle of a "CEPT radio amateur licence" under the conditions specified in Appendix 1 on which the member Administrations will levy neither duties or taxes, only the Administration issuing the licence being entitled to do so;

(proposed 2. that Administrations, not being members of CEPT, accepting the to be provisions of the Recommendation may participate under the ad-added) ditional conditions laid down in Appendices III and IV.

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A p p e n d i x   I I I

Participation of non-CEPT Administrations in amateur radio  
licensing procedures according to Recommendation T/R 61-01

1. Application

1.1. Administrations, not being members of CEPT, may apply to the managing CEPT Administration for admission to the amateur radio licensing system regulated by Recommendation T/R 61-01. Any administration applying for admission recognizes that notwithstanding the general definition of the term "recommendation", Recommendation T/R 61-01 is to be regarded as a binding regulation. Furthermore, it must be understood that in joining the CEPT Recommendation T/R 61-01 this agreement includes at the same time all CEPT countries which have implemented this Recommendation or will do so in future.

1.2 The application shall include a list of licence classes in the country concerned and their CEPT licence class equivalents. Details of national examination syllabuses or documents describing the requirements of the licence and their privileges shall also be enclosed with the application. Furthermore, the administration shall provide the call sign prefix(es) to be used, and details of any special conditions relating to the implementation of T/R 61-01 in the country concerned. Special conditions or restrictions should be confined to a minimum, and should not be imposed unless absolutely necessary.

#### Vetting of applications

The CEPT Radio Regulatory (RR) Working Group shall check each application to determine the equivalence of the licensing classes to those specified in Recommendation T/R 61-01, and to establish the acceptability or otherwise of any deviations from the Recommendation which have been requested by the applying Administration.

After agreement has been obtained from the Coordinating Committee on Radio Communications (CR) the managing administration notifies the applying administration and arranges for the Office de Liaison to include the relevant details in Appendix IV to Recommendation T/R 61-01.

#### A p p e n d i x IV

TABLE OF CORRESPONDENCES BETWEEN CEPT LICENCE CLASSES  
AND DIFFERENT NATIONAL CLASSES OF NON-CEPT COUNTRIES

No.	Country	Call sign prefix	CEPT classes corresponding to national classes in respective countries		Holders of CEPT classes authorised to transmit in accordance with national classes in force in respective countries	
			Class 1	Class 2	Class 1	Class 2
1	2	3	4	5	6	7
1						
2						
3						
4						
5						
6						

Note: If a non-CEPT country has been granted special conditions as per 1.2 these are to be included in a footnote. The number of the footnote will correspond to the number of the country as per column 1).



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The International Amateur Radio Union—since 1925 the federation of national Amateur Radio societies representing the interests of two-way Amateur Radio communications.

## Views on Common Licensing

Our column this month consists of a slightly updated version of the comments made by Norbert Gabriel, DJ7ZY, at the 1987 international informal ham meeting at Friedrichshafen, West Germany. Incidentally, for those of you traveling in Europe in 1988, this year's Friedrichshafen meeting will be held June 16-19. If you're interested, write DARC, PO Box 1155, D-3507 Baunatal, Federal Republic of Germany, for more details.

### The Situation in CEPT

After several years of discussions, in June 1985 the CEPT adopted a method of common Amateur Radio licensing, applicable within the CEPT only. This was a second try by CEPT after a first attempt in the 1970s had failed. The regional organization CEPT, with its official French name being Conference Européenne des Administrations de la Post et Telecommunication, comprises 26 member administrations from western Europe (in the political sense) including Yugoslavia. CEPT is similar to the organization CITEL in Region 2. One of the several reasons for the long period of discussion before success was achieved is because of the three-level decision-making structure in CEPT. When discussions started in CEPT, three member administrations (West Germany, France, Luxembourg) had already gained some good experience with bilateral operation agreements for radio amateurs. This experience had a positive impact on the further development of a common CEPT solution, because it showed some other countries which were hesitant that the idea did work out in practice.

An attempt by IARU Region 1 to attend a CEPT meeting dealing with this subject failed, because at that time the CEPT meetings were closed to observers. Nevertheless, the establishment of the IARU Region 1 Common License Group in 1981, very successfully chaired first by IIRYS, later DL1FL and now ON8MC, was and is a forum to foster the wishes of radio amateurs towards more cooperative licensing arrangements. In the meantime, CEPT has opened its meetings a bit for observers from certain international and national organizations. The new standing orders of CEPT should now be examined

in this connection to consider whether the attendance of IARU on a regular basis is appropriate.

Since the implementation of CEPT licensing, the number of the usual short-term visitor licenses which had to be issued by the German telecommunication administration (Deutsche Bundespost) have decreased drastically. Most certainly this reduction of administrative work will be similar within other CEPT administrations.

To review very briefly, there exist two CEPT license classes, 1 and 2. Class 1 is the higher class including operation on HF and VHF, while class 2 is the lower class for VHF work only. A few administrations have chosen CEPT Class 1 as being equivalent to their relatively low degree national license classes. According to CEPT Rec T/R 61-01, it is left up to the individual administrations to classify their national license classes, with the guidance that the operational possibilities for a radio amateur are not "considerably extended compared to those in his home country."

In March 1987 the Deutsche Bundespost informed 10 other CEPT administrations that CEPT class certificates from countries which are not yet able to implement Rec

T/R 61-01 will be acknowledged in Germany. Thus, for example, the British licensing authority is issuing CEPT license certifications to their radio amateurs for use in the Federal Republic of Germany. On 26 June 1987 the Dutch PTT informed 15 of those administrations not yet participating in the CEPT regulation about the same favorable unilateral concession for their amateurs visiting The Netherlands.

The application of CEPT Rec T/R 61-01 by 10 of the 26 CEPT administrations (as of June 1987) within two years after its entry into force can be considered as a good measure of success, especially when compared with the results of other CEPT recommendations. There exist many other CEPT recommendations which officially have been in force for many years but nevertheless are applied by only two or three administrations. The fact that 18 CEPT administrations have already classified their national license classes seems to be a good indicator that further progress can be expected.—Norbert Gabriel, DJ7ZY (Next month in this column we will have some further comment by DJ7ZY on how the CEPT concept can be spread to other areas of the world.—W1RU)

### Mini Directory

As a convenience to our readers, here is a list of items of particular interest and when they most recently appeared in QST.

Club Contest Rules	Jan 1988, p 86	Novice Enhancement Report and Order	Apr 1987, p 64
Considerate Operator's Frequency Guide	Jan 1988, p 13	Packet-Radio Frequency Recommendations:	
Constitution Bicentennial WAS	Sep 1987, p 14	Below 225 MHz	Sep 1987, p 54
Element 2 Question Pool, New and Revised		Above 225 MHz	Mar 1988, p 51
Questions, Answers	Apr 1987, p 23	QSL Bureaus	
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License-Renewal Information	Jan 1988, p 77	Third-Party-Traffic Agreements	This issue, p 65
Major ARRL Operating Events and Conventions—1988	Jan 1988, p 78	VUCC Annual Listing	Dec 1987, p 68
		What is Amateur Radio?	Mar 1988, p 26
		220-MHz Band NPRM	Apr 1987, p 16



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The International Amateur Radio Union—since 1925 the federation of national Amateur Radio societies representing the interests of two-way Amateur Radio communications.

## CEPT Licenses—Will They Spread Throughout the World?

Last month in this column we had some thoughts from DJ7ZY about CEPT licenses. This month he shares some further ideas with us on how the concept might be encouraged in other parts of the world. To a considerable extent, the success of his suggestions lies in the hands of individual Amateur Radio societies and how persuasively they approach their administrations with the concept of a Common License. The year 2000 is only 12 years away—wouldn't that be a good target date for worldwide implementation of a Common License?

### Thoughts on the geographical extension of CEPT regulation

1) *The implementation of CEPT Recommendation T/R 61-01 by additional CEPT administrations.* Amateur Radio societies of those CEPT countries not yet applying the CEPT Recommendation should approach their administrations in this respect. If the application of the Recommendation cannot be envisaged for the near future because of jurisdictional reasons, the Amateur Radio societies should at least apply for CEPT license-class certifications being issued to their radio amateurs. Such documents issued in conformity with the requirements of the CEPT Recommendation would enable their radio amateurs to operate in other CEPT countries without applying for individual visitor licenses.

2) *Possible participation of non-CEPT-member countries in the CEPT regulation.* (A) When in CEPT some years ago efforts were made towards achieving a common license, I had the opportunity to propose the inclusion of provisions for the participation of non-CEPT-member countries. However, it is understandable that at that time such a wide scope did not materialize because the concerned CEPT sub-working group did not even know if and how the whole matter would work out within the CEPT community. So this idea was dropped. This was a pity, because CEPT is a relatively small community compared with our sphere of interest—namely, the whole of Region 1 or even the whole world. But in my opinion the good experience gained meanwhile in CEPT now allows new efforts to be made towards an expansion

of the CEPT regulation to non-CEPT countries. I see two possible ways to achieve this.

(A) A non-CEPT country could ask a CEPT country to apply Recommendation T/R 61-01 in the two countries on the basis of a bilateral agreement. This could work, because similar bilateral operational agreements have been in force for a number of years. Even two non-CEPT countries could come to such bilateral agreements on the basis of CEPT Rec T/R 61-01. The German PTT administration is very much in favor of such procedures.

(B) Another, and, in my opinion, better way of opening the CEPT regulation to non-CEPT countries could be tried along the following lines. Some non-CEPT countries could approach the CEPT with their desire to participate in the CEPT Recommendation. At this stage, I judge the readiness of CEPT to discuss this topic as being good. The German PTT administration, for example, certainly would support such ideas. Of course, some additional provisions would have to be agreed upon. These additional rules for "newcomers"—that is, new countries—preferably could form a new Appendix III of CEPT Rec T/R 61-01. One important part of this new Appendix then would have to be a list of equivalences of the national license classes as compared with the two CEPT classes.

Without going into detail, I would like to point out another fact which should be recognized by every participating non-CEPT country as well as by every radio amateur of any participating country. Although from the expression and its general meaning a "Recommendation" seems to be something noncompulsory, within CEPT it has the meaning of being absolutely binding. Within CEPT all rules for the harmonization of technical, operational or administrative matters are laid down in the form of "Recommendations." The rules have to be observed by all administrations which implement the respective recommendation.

(3) While up to now the Amateur Radio societies of non-CEPT countries perhaps have not been too interested in this whole issue of common licensing, because the first step in this respect was organized within a small group of Region 1 countries, hope-

fully this lack of interest will be overcome now. DARC will of course continue its efforts to extend the area of validity, but it is now necessary for other Amateur Radio societies not within CEPT also to participate actively in the work of the IARU Region 1 Common License Group (CLG).

The terms of reference of this CLG were laid down in 1981. At this stage, one may probably summarize the necessary action in the shortest way by calling...

"CQ DX for countries wishing to participate in the Common License."

—Norbert Gabriel, DJ7ZY

QST

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April 24, 1991

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Secretary  
Federal Communication Commission  
Washington, DC 20554

Reference: Petition for Rulemaking RM-7680

Dear Sirs,

Enclosed is a printout of messages which contains comments that I received through an Amateur Radio Bulletin Board System (BBS) in Frankfurt, Germany from a couple of European Amateurs. Apparently these gentlemen were not aware of how to mail them to the Commission.

On April 10th, I received your March 27th letter, notifying me that a RM number had been assigned to my petition, through the APO mail. Since I may not have time to comment on the responses to any comments due to the delays in mail service to the APO, I would like to take this opportunity to make a few comments at this time.

By the way, this letter is being mailed to the Commission from Lindsey AS, Germany using the only method which will allow me to get this letter to Washington, DC in time, APO Express Mail Next Day Service.

First, I do hope that the FCC can find a way to implement as much of the recommendations made in RM-7680 as possible and can overcome any unforeseen technicalities which might delay or block the initiative. This is a proposal who's time has come. The United States must take the lead toward international recognition of national Amateur Radio Licenses rather than waiting to be the last and being coerced into accepting some form of perhaps less than desirable common licensing scheme.



The idea behind this petition is simple. The FCC now recognizes Amateur Radio Licenses issued by the itself and Canada. FCC Recognition of the CEPT Recommendation T/R 61-01 (CEPT) License would be essentially the same as FCC recognition of a Canadian License. FCC recognition of the CEPT License would send a message to Europe that the U.S. is interested in breaking down any perceived "Fortress Europe" barriers and encourage the CEPT to adopt the proposed extension of the recommendation.

Having seen many American Service Members who hold a valid FCC Amateur Radio License come to Europe while serving their country and have to go through lengthy and complicated procedures to receive a license to operate Amateur Radio, I for one, will be very happy to see the United States begin a process that should encourage European Postal Administrations to allow U.S. Amateur Radio operators to participate in CEPT Recommendation T/R 61-01. We at least owe it to our American Service Members who are proudly serving their country away from home, if for no one else.

In addition to recognizing the CEPT License, which will allow Europeans to operate in the U.S. without the paperwork and wait, I hope that the FCC will encourage all European Postal Admistrations to allow U.S. Amateurs to operate in Europe reciprocally by immediately forging an agreement with the German TELEKOM since they have indicated their willingness to recognize the U.S. license in Germany as long as the U.S. reciprocates (by recognizing the CEPT license). Other European Postal Administrations would also be willing to participate in such agreements while waiting for the outcome of the request of extension of the CEPT Recommendation to countries outside CEPT.

Thank you in advance for allowing me to suggest ways in which the FCC can save the United States Government and Taxpayers money while at the same time reflecting the American tradition of championing programs which benefit others.

Sincerely,

Stephen R. Huthuis

DA2HS @DB0GV de:DAZEN 24.02.91 12:48 UTC 1451 Bytes  
School Science Fair

de DAZEN @ DB0GV

Hello Steve. Here is the information on the science fair:

Regional Science Fair - 10 May 91

The Hainerburg Middle School has asked the WiesARC to participate in the school's Regional Science Fair scheduled for 10 May 91. The club has participated two years in a row in a similar event held by the Frankfurt Elementary School. Those who participated enjoyed it tremendously and, both the club and amateur radio received some good publicity. The only requirements to participate are some equipment to setup a display, 3-4 motivated individuals, and some free time. It is very easy! All we do is setup a display ( 2 mtr radio, HF radio, packet station, morse code keys, QSL card display, etc.) and talk to the kids for about 10-15 minutes about amateur radio and answer any questions they may have. In past events, we were asked some interesting questions, not only by student, but also by the faculty as well. The event is a lot of fun and, for those interested, counts toward the club's participation award! If interested, either contact me or mention it during the VHF roundtable or club meeting. I would like to provide an answer to the school Point of Contact at least by mid-March to help them in their planning. Thanks and hope to hear from you soon - DAZEN.

Feel free to correct/edit as necessary. CUL - 73 de Tony

DA2HS @DB0GV de:DL1GBM 05.04.91 21:34 UTC 557 Bytes  
ur fcc petition

910405/2127z DB0CZ , 910405/22301 DB0FRB  
de DL1GBM @ DB0FRB

Hello Steve,  
just read about Your petition to the fcc !  
Great that You try it... I and many others truly wish a success,  
not only me, hi...  
Best wishes from a non-american but very interested OM in the  
Black Forest....  
\*\*\* VY 73, Michael (05.04.91 - 20:24:14 UTC) + \*\*\*

DA2HS @DB0GV de:DG1PJ 08.04.91 13:22 UTC 675 Bytes  
congrats on FCC/CEPT

910408/1224z DB0GE , 910408/1053z DB0IZ , 910408/1050z DK0MWX  
910408/1000z DB0SGL  
de DG1PJ @ DB0SGL

de DG1PJ @ DB0SGL  
Hello Steve,  
congratulation on your initiative to extent the CEPT license to the US of of  
A! From my own experience with travels to the US and having Ham visitors  
from the US, this would be a major step forward! Thanks a lot.  
best 73 Jan, DG1PJ & KN4VR @ DB0SGL

PAGE 1

DA2HS @DB0GV de:PI5DD 08.04.91 14:52 UTC 1472 Bytes  
CEPT license <> FCC license

910408/1454z DB0EAM, 910408/1442z DB0BQ, 910408/1439z DB0AHA  
910408/1353z PI8DAZ, 910408/1144z PI8AWT, 910408/1104 PI8JYL

Dr. Stephen,

I read your message and was delighted with the prospect of possibly being able to operate in the US in the future just like I can in those CEPT countries that have ratified the common licensing.

I have been in the Royal Netherlands Navy for over 15 years with hopefully many more to come, and on several trips I visited the US and US bases all over the world. On several occasions I didn't get to operate because I couldn't get the paperwork done in time, mail takes a very long time to get to me when I'm out on the high seas hihi.

I haven't discussed the matter with fellow Hams in the RNIN yet but I'm quite sure they too will greatly applaud your move to get this red tape out of our ways!

I'm not sure where to send the message supporting RM-7680 as the address in your message didn't include any streetname or PObox number. Could you give me the full address in a PR message?

Best 73 de Paul (PA3FDQ) PI5DD @ PI8JYL

DA2HS @DB0GV de:DA2TD 14.04.91 22:20 UTC 601 Bytes  
Mars 2 mtr packet

de DA2TD @ DB0GV

Hello Steve. I tried to talk to you after the club meeting but it seemed to be impossible. I talked to Dan and The station at Rhein Main told him they have been waiting two months for us to install the 2mtr packet. I called the station and asked them if they had the 332 approved to install it and Ox did not know if anyone had submitted one. He is going to check with perry and get back to me. It would be nice to have it up and working. I will keep you informed. CUL-73-Tom.

DA2HS @DB0GV de:DA1DW 14.04.91 23:13 UTC 1671 Bytes  
QUA News !

910414/2321z DB0LJ, 910414/2313z DB0GE, 910414/2115z LX0PAC  
de DA1DW @ LX0PAC

Hello Bob, how have you been? I hope all is good for you. You and others do so good with publishing the QUA, that some information is like gold ! Each month can you or someone in Wies-ARC extract some of the news you publish in QUA that may apply to all DA/DJ stations in Germany and put it in the CQDA file of the packet BBS system? Things like your planned trip to Liechtenstein, German Bureau QSLing Rules, Foreign Service Nets, New Technician Class License Conversion Information from the DBP, CSCE information, Regional Science Fair, and the Wiesbaden ARC participation award program are just a few examples of topics that all DA and DJ hams would be interested in. Not all DA and DJ hams belong to Wies-ARC, so this valuable information is not passed on to those hams. Wies-ARC would be doing a great service to other DA and DJ hams if you would

PAGE 2

September 16, 1991

Stephen R. Hutchins / KN6G & DJØHB  
PSC 14, Box 4205  
APO AE 09192

Secretary  
Federal Communication Commission  
Washington, DC 20554

Reference: Petition for Rulemaking RM-7680 Late Comments

Dear Sirs,

I request that these late comments be considered in conjunction with the above mentioned Petition for Rulemaking. The information presented here is intended to clarify what I perceive to be important points which significantly impact the petition. These important points were brought to my attention long after the petition had been assigned a Rule Making number and the original comment period closed. However, I believe that they are of such importance that they deserve consideration.

The present language of the agreement which authorizes a foreign Amateur Radio operator to operate in the U.S.A. by applying for and receiving an FCC Alien Operators Permit, is inadequate and flawed. The control operator holding an FCC-issued reciprocal permit for alien amateur license (Alien Operators Permit) conveys the operating terms and conditions of the amateur service license issued by the aliens government, restricted by the applicable provisions of the FCC Rules, but not to exceed the control operator privileges of an FCC-issued Amateur Radio Extra Class operator license. While the intent of this agreement is basically correct, it leaves the Foreign Amateur Radio operator from Europe who is a guest in the U.S.A. subject to harassment. For example, the German Amateur Radio License conveys privileges in the 2 Meter Band from 144-146 MHz and in the 70 cm Band from 430-440 MHz only, due to the restrictions on the band in ITU Region 1. Therefore, a German Amateur

operating in the U.S. in the 6 Meter Band from 50-54 MHz, the 2 Meter Band from 146-148 MHz, the 1.25 Meter Band from 222-225 MHz, and the 70 cm Band from 420-430 or 440-450 MHz using an Alien Operator Permit is actually illegal by the strictest interpretation of the agreement. I do not believe that the U.S. Government wishes to place foreign guests in our country in a position which forces them to make a decision whereby they either 1) operate absolutely legally without access to U.S. Amateur Radio Repeater Bands or 2) jeopardize their licenses by operating in these sub-bands at the mercy of the interpretation of FCC Field Office personnel throughout the United States. I sincerely believe that simply equating the CEPT License to a U.S. equivalent license and allowing CEPT licensees to operate within those equivalents as recommended in the Petition for Rulemaking will be all that will be needed to rectify this situation and eliminate any harassment caused by the "interpretation factor".

At the CEPT meeting in Kiruna, Sweden, during June 3rd-7th, 1991, the CEPT discussed the "Proposal for the extension of CEPT Recommendation T/R 61-01 to include voluntary participation by administrations which are not members of CEPT." The participants of the conference agreed the proposal had merit and are now requesting comments from all participating CEPT Administrations plus the IARU. Additionally, the participants made a slight editorial revision to the existing CEPT Recommendation T/R 61-01 which will allow any newly adopted amendments or appendixes to be easily added to it. There now appear to be no major obstacles which would prevent the CEPT from accepting this proposal and implementation would be as simple as including it as an appendix. The next meeting of the CEPT will be November 22, 1991 in Paris, France, at which time comments from the different Administrations and the IARU will be considered and a decision taken to either accept or reject the proposal. As can be seen from the DL-Rundspruch Nr. 16/91 photocopy (German text) which I have attached to this letter of comment, the fact that the FCC had not rejected the WiesARC Petition for Rulemaking, but instead accepted it and assigned a Rulemaking Number to it and opened it to comment, sent an encouraging signal to the CEPT that the United States is willing to consider the common license concept. Since the CEPT will be taking this matter into consideration at their Paris meeting, perhaps the FCC may want to place RM-7680 on Docket before then so that the U.S. can be in a position to be the first country outside CEPT to request participation in the Recommendation should it be adopted then. If the matter cannot be placed on Docket earlier, at least the FCC should be courteous enough

to send some kind of message to the CEPT before the Paris meeting indicating the FCC's willingness to endorse the concept presented in RM-7680 and participate in the Recommendation, as I understand this is the recently stated position of Private Radio Bureau Chief, Ralph Haller.

One last item of extreme importance: Since I am the person who submitted the Petition for Rulemaking for the Wiesbaden Amateur Radio Club, I would like to inform you of recent changes in my status and address. First, due to a change of my residency status in Germany, my German Amateur Radio Call sign has been formally changed from DA2HS to DJØHB. Secondly, due to the realignment of the APO postal system to conform with U.S. Postal requirements, my mailing address has changed to include a PSC Number before the Box Number and the APO Number has changed from APO NY 09633 to APO AE 09192 as indicated above. Please mail any correspondence to me at this new address.

Thank you again for allowing me to suggest ways in which the FCC can enhance the United States Government's image Internationally while at the same time participate in the great American tradition of championing programs which benefit others.

Sincerely,

Stephen R. Auble

DARC - ALLE : de:DL0BN 25.04.91 14:07 : 0 8625 Bytes

DL-RUNDSpruch NR. 16/91

\*\*\* Bulletin-ID: 254102DB0GR \*\*\*

910425/1351z DB0EAM, 910425/1340z DB0KG , 910425/1319z DK0MAV  
910425/1304z DB0GR  
de DC7XJ - DB0GR

#### DEUTSCHLAND-RUNDSpruch DES DARC NR. 16/91 VOM 26.04.1991

##### Anwendung der CEPT-Lizenz fuer aussereuropaeische Laender erwogen

Der DARC hat sich fuer die Anwendung der CEPT-Lizenz auch in solchen Laendern ausgesprochen, die nicht Mitglied der CEPT sind. Einen entsprechenden Vorschlag hat das Exekutiv-Komitee der IARU Region 1 an die CEPT-Arbeitsgruppe fuer Funkregelungen weitergeleitet.

Es wird damit gerechnet, dass dieses Thema auf einer Tagung der Arbeitsgruppe beraten wird, die vom 03.-07.06.1991 im schwedischen Kiruna stattfindet. Auf dieser CEPT-Tagung wird der Amateurfunkdienst erstmalig vertreten sein. Vorausgegangen war eine Aenderung der Geschaeftsordnung der CEPT, nach der Nutzer bestimmter CEPT-Empfehlungen an solchen Tagungen teilnehmen duerfen.

Inzwischen hat der Wiesbaden Amateur Radio Club eine Gruppierung von US-Funkamateuren in Deutschland, den Inhalt des DARC-Vorschlags der amerikanischen Fernmeldebehoerde FCC zugeleitet. Die FCC machte dies am 27.03. bekannt. Gemass den FCC-Bestimmungen kann jeder US-Buerger dazu innerhalb von 30 Tagen Kommentare einreichen.

Ohne Zweifel waere zur Tagung der CEPT eine unterstuetzende Meinungsaeusserung seitens der FCC hilfreich.

##### Kanada erhebt Gebuehren fuer Besucherlizenzen

Seit dem 01.04.1991 verlangt die kanadische Fernmeldeverwaltung Gebuehren fuer die Erteilung von Besucherlizenzen. Fuer 30 Tage Gueltigkeitsdauer werden 7 kanadische Dollar erhoben. Bei Aufenthalten von ueber 30 Tagen ist ein Anteil an der kanadischen Jahresgebuehr von 29 Dollar zu zahlen, der sich nach der Zeitdauer richtet.

Antraege sind nunmehr mit einem Formblatt beim Department of Communications zu stellen. Es wird empfohlen, dabei gleichzeitig eine Kopie des "Radio Information Circular 25" anzufordern. In ihm sind die Betriebsbestimmungen enthalten.

Fuer Inhaber der deutschen Klasse C gibt es eine kanadische Lizenz entsprechend der CEPT-Lizenzklasse 2. Inhaber der Klasse A erhalten eine entsprechende kanadische Lizenz. Fuer B-Lizenzen wird eine Lizenz erteilt, die der CEPT-Klasse 1 entspricht. Diese Angaben teilte der General Manager des kanadischen Amateurfunkverbandes CRRL, Ray Staines, VE3ZJ, mit.

##### Verbesserte Lizenzbedingungen in Grossbritannien

Eine Reihe von Verbesserungen der Lizenzbedingungen hat die britische Lizenzbehoerde am 05.04.1991 in Kraft gesetzt. Danach wurde die maximale PEP-Ausgangsleistung auch fuer Telegrafie fuer die Amateurbaender zwischen 3,5 und 28 MHz sowie fuer 144 MHz und die Baender oberhalb von 432 MHz auf 400 Watt festgelegt.